



Colorado Department  
of Public Health  
and Environment



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November 2, 2001

Joe Legare  
Assistant Administrator for Environment and Infrastructure  
U.S. Department of Energy-RFFO  
10808 Highway 93, Unit A  
Golden CO 80401-8200

RE: Draft Final Industrial Area Sampling and Analysis Plan Addendum #02-01

Dear Mr. Legare:

The Colorado Department of Public Health & Environment and the Environmental Protection Agency have reviewed the document referenced above. With the exception of IA Group 900-4&5, this addendum is approved. IA Group 900-4&5 can be approved once the comments below are addressed.

This document could be easier to review if more of the pertinent information were provided in the document itself, so that reviewers are not required to pull tables and text from a number of different sources. This would not involve much additional work and would not make the addendum much more lengthy. Specifically, add the text for each IA Group from Appendix C of the IASAP to the packets. The maps entitled *Location of Existing Sample Results above Detection Limits or Background Levels for IA Group XX* should provide background levels, detection limits, and action levels for all results that are posted on the maps for easy side-by-side comparison. Providing these values is preferable to merely indicating whether or not the sample results are above action levels.

IA Group 900-4&5

The text accompanying the geostatistical data needs to include an explanation of how these data were used to select sampling locations, as discussed in a conference call. The table entitled *IHSS Group 900-4&5 Input Parameters DATA Values* needs some explanation. Are these SOR values, and if so, are they for the existing sample locations? The SOR calculation for at least a few should be included. How are analytes that have no action level, such as phenanthrene, pentadecane, and heptadecane The table entitled *IHSS Group 900-4&5 Input Parameters DATA Values* needs some explanation. Are these SOR values, and if so, are they for the existing sample locations? The SOR calculation for at least a few should be included. How are analytes that have no action level, such as phenanthrene, pentadecane, and heptadecane 2, 6, 10, 15-tetrame...?, included in the SOR calculation? The parameters provided on the following page

ADMIN RECORD

1A-A-000859

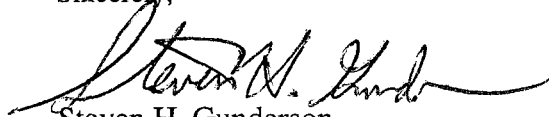
need some explanation as well. Finally, radionuclide analysis should be added to the list for this group since radionuclides have been detected above background and have historically been stored at this location.

included in the SOR calculation? The parameters provided on the following page need some explanation as well. Finally, analysis for radionuclides should be added to the list for this group since radionuclides have been detected above background and have historically been stored at this location.

The *Probability Map of Non-Radionuclides Sum of Ratios Indicator Kriging Results* is distorted with respect to other maps and should either be deleted or provided in the same perspective as the other maps. A QC check of the results posted on the map *Location of Existing Sample Results above Background Levels or Detection Limits* found that results are missing (but are available from the Data Summary Report CD). Missing are Pu and Am results for locations 99A9500-004 thru 008, which are above background levels for surface soils. SS011993 is missing at least phenanthrene (350 µg/kg); SS012193 is missing at least Ni (35.3 µg/kg) and Ag (1.2 µg/kg).

If you have any questions regarding this approval, please contact Carl Spreng at 303-692-3358 or Gary Kleeman at 303-312-6246.

Sincerely,



Steven H. Gunderson  
RFCA Project Coordinator  
Colorado Department of Public  
Health and Environment



Tim Rehder  
Rocky Flats Project Manager  
Environmental Protection Agency

cc: Norma Casteñeda, DOE  
Dave Shelton, K-H  
Lane Butler, K-H  
Dan Miller, AGO  
Steve Tarlton, RFOU  
Susan Chaki, CDPHE  
Admin. Record, Bldg. 850

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